

M25-04-2017-S25-04-2017-725770075



25915

13 April 2015

SKAT
Betalings og Regnskab
Helgeshøj Alle 9
2630 Taastrup
Denmark

Attention: Sven Nielsen, Danish Dividends Tax Department

Re: Danish Dividend Tax Reclaim for:
The Bradley London Pension Plan (TIN: 47-1864702)
31w 21st street, Apt 2n, New York, NY, 10010, USA

Dear Sven,

In connection with the Convention for the Avoidance of Double Taxation between Denmark and the United States of America, please find enclosed a reclaim application from a qualifying US pension fund for a complete refund of Danish Dividend Tax that was previously withheld in relation to their investments.

Please find enclosed the following forms to assist with the claim:

- A completed 06.003 ENG Form - Claim to Relief from Danish Dividend Tax;
- Two original Dividend Credit Advice slips;
- An original Certificate of Residence – Form 6166 - for tax year 2015;
- The Power of Attorney granted by The Bradley London Pension Plan to Syntax GIS Ltd.

Please contact us should you have any questions or require any further information.

Yours sincerely,

Camillo Vargas, Director | +44 20 3709 4185 | cv@syntax-gis.com

The name Syntax GIS is a registered trade mark of Syntax GIS Ltd. Syntax GIS Ltd is a limited liability company registered in England and Wales, company registration number 08956766
VAT registration number 18513890, and has its registered office at 145-157 St John Street, London, EC1V 4PW, United Kingdom

SKAT Fredensborg

Bilag nr. 25-5-1

EXHIBIT

3



Claim to Relief from Danish Dividend Tax

☐ In my capacity as beneficial owner

☒ On behalf of the beneficial owner
Claim is made for refund of Danish dividend tax, in total DKK: 29,614,463.73

Beneficial Owner

Full name
The Bradley London Pension Plan

Full address

31w 21st street, Apt 2n, New York, NY, 10010, USA

E-mail

taxreclaims@syntax-gis.com - attention: Camilo Vargas - (+44 020 37094186)

Signature
Beneficial owner/applicant

Camilo Vargas

If the claim is made on behalf of the beneficial owner the applicant's power of attorney shall be enclosed

As documentation is enclosed dividend advice(s), number: 2

(This documentation is obligatory)

Financial institution

The amount is requested to be paid to:

Name and address

Barclays Bank Plc.
Building 315, Heathrow Airport, Hatton Cross, TW6 2JJ, United Kingdom
Name of the Account holder: Syntax GIS Ltd

Reg. no

Account no

46065800

SWIFT

BLZ

IBAN

BARCGB22

GB76 BARC 203883 4606 5800

Certification of the competent authority

It is hereby certified that the beneficial owner is covered by the Double Taxation Convention concluded between Denmark and

Date

Official stamp and signature

When signed to be forwarded to:

Skattecenter Høje-Taastrup

Postboks 60
DK-2630 Taastrup

SKAT Fredensborg

Bilag nr. 25-5-2



Solo Capital

10 Exchange Square,
Primrose Street, London, EC2A 2EN

DIVIDEND CREDIT ADVICE
Issue Date: 24-03-2015, Issue No: 3,407

The Bradley London Pension Plan
31W 21st Street
Apt. 2N
New York
NY 10010
United States of America

Date: 24-03-2015

Dear Sirs,

Please be advised that we have credited your account BRA01, for the value date of 24-03-2015. This payment represents the dividend as shown below:

Security Name:	NOVO NORDISK A/S-B
Sedol:	BHC8X90
ISIN:	DK0060534915
Ex Date:	20-03-2015
Record Date:	23-03-2015
Pay Date:	24-03-2015
Dividend Per Share:	DKK 5.00
No of Shares:	6,080,339
Gross Dividend:	DKK 30,401,695.00
Tax:	DKK 8,208,457.65
Net Dividend:	DKK 22,193,237.35

SKAT Fredensborg

Bilag nr. 25-5-3



10 Exchange Square,
Primrose Street, London, EC2A 2EN

DIVIDEND CREDIT ADVICE
Issue Date: 07-04-2015, Issue No: 4,441

The Bradley London Pension Plan
31W 21st Street
Apt. 2N
New York
NY 10010
United States of America

Date: 07-04-2015

Dear Sirs,

Please be advised that we have credited your account BRA01, for the value date of 07-04-2015. This payment represents the dividend as shown below:

Security Name:	AP MOELLER-MAERSK A/S-B
Sedol:	4253048
ISIN:	DK0010244508
Ex Date:	31-03-2015
Record Date:	01-04-2015
Pay Date:	07-04-2015
Dividend Per Share:	DKK 1,971.00
No of Shares:	40,224
Gross Dividend:	DKK 79,281,504.00
Tax:	DKK 21,406,006.08
Net Dividend:	DKK 57,875,497.92

SKAT Fredensborg

Bilag nr. 25-5-4



CERTIFICATION
PROGRAM

DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
PHILADELPHIA, PA 19255

Date: March 2, 2015

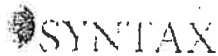
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Taxpayer: THE BRADLEY LONDON PENSION PLAN
TIN: 47-1864702
Tax Year: 2015

I certify that, to the best of our knowledge, the above-named entity is a trust forming part of a pension, profit sharing, or stock bonus plan qualified under section 401(a) of the U.S. Internal Revenue Code, which is exempt from U.S. taxation under section 501(a), and is a resident of the United States of America for purposes of U.S. taxation.

Nancy J. Aiello
Field Director, Accounts Management



2018-08-15 10:00:00 AM

LIMITED POWER OF ATTORNEY

The Bradley London Pension Plan, (the "Grantor") TAX ID: 47-1864702,

With an address at: 31w 21st street, Apt 2n, New York, NY, 10010, USA.

hereby makes, constitutes and appoints Syntax GIS Ltd, a UK corporation, having its principal place of business at 288 Bishopsgate, London, EC2M 4QP, United Kingdom as its true and lawful attorney-in-fact and agent, to

1. Sign and file with applicable authorities any and all applications, requests, or claims for refund, reduction, repayment, and credit of, or exemption or relief from, any withholding or similar taxes in any jurisdiction,
2. To request a refund of the excess tax withheld by submitting claims with foreign custodians, withholding agents, or issuers.
3. To obtain any documents or other information required for that purpose, including but not limited to requesting and obtaining tax residency certification in the name of the Grantor as may be necessary to carry out the above.
4. To represent the Grantor at all kinds of administrative appeals and present economic-administrative reclaims to the relevant authorities, tribunals, and courts.
5. To receive and distribute all repayments owed in above context from foreign tax authorities, custodians, withholding agents or issuers in the name of the Grantor and to acknowledge the receipt of such amounts.

This Limited Power of Attorney shall take effect upon execution of the document and remain in effect until the Limited Power of Attorney has been terminated by either party by providing ten days prior written notice of its intent to terminate to the other party, whichever is earliest.

IN WITNESS WHEREOF we have caused this Limited Power of Attorney to be executed by our duly authorized representative this 27 day of March, 2015.

For: The Bradley London Pension Plan

With an address at: 31w 21st street, Apt 2n, New York, NY, 10010, USA

Signature:

Name:

Doston Bradley

Title:

Authorised Representative

SKAT Fredensborg

Bilag nr. 25-5-6